Mr. Earl Miller
Millennium Products, Inc.
P. O. Box 1186
Elkhart, Indiana 46515-1186

Re: AA 039-11793-00067
First Administrative Amendment to
Part 70 039-7096-00067

Dear Mr. Miller:

Millennium Products, Inc. was issued a Part 70 permit 039-7096-00067 on December 28, 1999 for a plant that manufactures fiberglass reinforced plastic for industrial, transportation, home and recreational applications. A letter requesting an amendment to the Part 70 permit was received on January 22, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (changes are bolded and deletion are struck-through for emphasis):

Request Change 1: Condition D.1.1(d) should specify that acetone will only clean spray guns used from spray coating of gelcoat and resins. Lacquer thinner will be used to clean guns used from surface coating and touch-up painting.

OAM Change 1: Condition D.1.1(d) will be revised to reflect the source request. The revision will not result in the increase of the sourcewide VOC potential to emit (PTE) of less than 250 tons per year. The revision is as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) through (c) No change

(d) Acetone shall be used to clean spray guns **used from spray coating of gelcoat and resins. Lacquer thinner shall be used to clean spray guns used from surface coating and touch-up painting.**

Request Change 2: In the project description table Section D.2, of the Part 70 permit, the sanding and grinding operation do not exhaust to stack F-14, they exhaust inside the building.

OAM Change 2: The sanding and grinding operation in the project description table will be revised to state that these operations exhaust inside the building, instead of exhausting to stack F-14. See revision as follows:

Facility Description [326 IAC 2-7-5(15)]:

(a) One sanding / ~~and~~ grinding booth (C-2) with a maximum throughput of 1,250 pounds of fiberglass reinforced plastic components per hour, exhausting to a ~~dry filter~~ **dust collector** with a particulate matter control efficiency of 99%, exhausting ~~to stack F14~~ **inside the building**.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Request Change 3: The corrections made in the above table should also be reflected in Condition D.2.3.

OAM Change 3: Section A.2(e) and Condition D.2.3 will be revised to reflect the revision in OAM Change 2. Revision is as follows:

D.2.3 Particulate Matter (PM)

The ~~dry filter~~ **dust collector** for PM control shall be in operation ~~and control emissions~~ **at all times when** ~~from~~ the sanding / ~~and~~ grinding booth ~~at all times that the sanding and grinding booth~~ is in operation.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern regional Office
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Millennium Products, Inc.
57755 Holiday Place
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7096-00067	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:
1st Administrative Amendment: AA039-11793-00067	Pages Affected: 2, 28, & 32,
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass reinforced plastic component manufacturing facility which produces fiberglass reinforced plastic components for industrial, transportation, home, and recreational applications.

Responsible Official:	Earl H. Miller
Source Address:	57755 Holiday Place, Elkhart, Indiana 46517
Mailing Address:	P.O. Box 1186, Elkhart, Indiana 46517
Phone Number:	(219) 293-3840
SIC Code:	3089
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Synthetic Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gelcoat guns (GG-01 and GG-02) for gel and catalyst application and four (4) HVLP chop guns (CG-01, CG-02, CG-03, and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gelcoat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.

(b) Surface coating operations contained in two (2) spray booths (B1and B8), consisting of two (2) HVLP guns (PG-01 and PG-02), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.

(c) Touch-up painting operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, exhausting inside the plant building.

(d) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.

(e) One sanding / grinding booth (C-2) with a maximum throughput of 1,250 pounds of fiberglass reinforced plastic components per hour, exhausting to a dust collector with a particulate matter control efficiency of 99%, exhausting inside the building.

SECTION D.1FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Fiberglass reinforced plastic component manufacturing operations contained in three (3) booths (B5, B6, and B7), consisting of two (2) HVLP gelcoat guns (GG-01 and GG-02) for gel and catalyst application and four (4) HVLP chop guns (CG-01, CG-02, CG-03, and CG-04) for resin and catalyst application, with a maximum capacity of twenty (20) parts per hour for each gelcoat gun at 0.95 gallons of gel per part, and ten (10) parts per hour for each chop gun at 9.30 gallons of resin per part, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F7, F8, F9, and F10.

(b) Surface coating operations contained in two (2) spray booths (B1 and B8), consisting of two (2) HVLP guns (PG-01 and PG-02), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.45 gallons of coating used per part produced, using dry filters with 99% control efficiency as particulate matter control, and exhausting to stacks F1 and F11.

(c) Touch-up painting operations, consisting of ten (10) HVLP guns (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10), which can accommodate a total of 40 parts per hour with a maximum capacity of 0.25 gallons per minute per gun with approximately 0.08 pounds of paint used per part produced, exhausting inside the plant building.

(d) Miscellaneous operations utilizing filler/putty for product repairs, wax for molds and mold repairs, and clean-up solvents, exhausting inside the plant building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 039-4439-00067, issued May 30, 1996, and 326 IAC 8-1-6 (New facilities; general reduction requirements), compliance for the fiberglass reinforced plastic manufacturing operations (B5, B6, and B7), surface coating operations (B1and B8), and touch-up painting operations (TU-1, TU-2, TU-3, TU-4, TU-5, TU-6, TU-7, TU-8, TU-9, and TU-10) shall be accomplished by the following:

(a) All booths shall utilize air assisted spray applicators at all times for gel coat and chop operations;

(b) The average styrene concentration in the resin used in the chop coat booths and the gel coat booths shall not exceed 40%;

(c) All paint guns shall be high volume low pressure (HVLP) resulting in less usage with the high transfer efficiency of 75%; and,

(d) Acetone shall be used to clean spray guns used from spray coating of gelcoat and resins. Lacquer thinner shall be used to clean spray guns used from surface coating and touch-up painting.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) One sanding / grinding booth (C-2) with a maximum throughput of 1,250 pounds of fiberglass reinforced plastic components per hour, exhausting to a dust collector with a particulate matter control efficiency of 99%, exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sanding and grinding booth shall not exceed 2.99 pounds per hour when operating at a process weight rate of 1,250 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The dust collector for PM control shall be in operation at all times whenever the sanding / grinding booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

No compliance monitoring provisions are required at the time of permit issuance for this facility.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

No record keeping and reporting provisions are required at the time of permit issuance for this facility.